

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

NAPOLÉON SEPÚLVEDA MORENO, §  
and LUZ MARIA MARTINEZ CASTRO, §  
and SANDRA LIZETTE CARDENAS §  
RAMIREZ, as Next Friend of S.S.C., §  
minor child, Individually and for and §  
on behalf of All Those Who Are Entitled to §  
Recover Under the Texas Wrongful Death §  
and Survival Acts for the Death of §  
JESUS IVAN SEPÚLVEDA MARTINEZ, §  
and BRENDA BERENICE CASIAS §  
CARRILLO, §

*Plaintiffs,* §

v. §

LASALLE CORRECTIONS V LLC, §

*Defendant,* §

CIVIL ACTION NO. 3:24-CV-00059-DB

Jury Trial Demand

**PLAINTIFFS' SUPPLEMENT TO PLAINTIFFS' RESPONSE TO NON-PARTY  
DISTRICT ATTORNEY'S MOTION TO QUASH SUBPOENA AND MOTION FOR  
PROTECTIVE ORDER**

Plaintiff supplements her Response to Non-Party District Attorney for the 34<sup>th</sup> Judicial  
District of Texas Bill Hicks' motion to quash subpoena with the attached proposed order.

Respectfully submitted,

BENOIT LEGAL, P.L.L.C.  
The Law Center  
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/s/ Christopher Benoit  
CHRISTOPHER BENOIT  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 18, 2024, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will cause all parties or counsel of record to be served by electronic means.

/s/ Christopher Benoit  
**Christopher Benoit**

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FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

NAPOLEÓN SEPÚLVEDA MORENO,  
et al.,

*Plaintiffs,*

v.

LASALLE CORRECTIONS V LLC,

*Defendant,*

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CIVIL ACTION NO. 3:24-CV-00059-DB

**ORDER**

Having considered Non-party District Attorney for the 34<sup>th</sup> Judicial District of Texas Bill Hicks' (Movant) motion to quash subpoena served on Movant on August 21, 2024 (motion), Plaintiffs' Response to Movant's motion, and all other argument in the above-styled and numbered cause, this Court is of the opinion that said motion should be **DENIED**.

It is therefore ORDERED that Movant's motion seeking a protective order and quashing the subpoena is hereby **DENIED**.

Movant is ordered to respond in full to Plaintiffs' subpoena subject to a mutually agreeable confidentiality and protective order in this matter.

The parties and movant are ordered to file a confidentiality and protective order in this case within seven days of this Order.

**SIGNED AND ENTERED** this \_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
**The Honorable David Briones**  
**Senior United States District Judge**